

Exhibit 2

From: [Steven R. Pounian](#)
To: [Shen, Andrew C.](#); [Kellogg, Michael K.](#); [Rapawy, Gregory G.](#); [Huppert, Matthew R.](#)
Cc: [Kreindler, James](#); [Maloney, III, Andrew](#); [Megan Benett](#); ["SCarter1@cozen.com"](#); [Tarbutton, Joseph](#); [zRobert Haefele](#); [Goldman, Jerry](#); [John Fawcett](#); ["Kry, Robert"](#); ["Nitz, Eric"](#); [John Fawcett](#)
Subject: [EXTERNAL] RE: In re 9/11
Date: Friday, May 21, 2021 4:38:15 PM

Dear Andy,

Plaintiffs do not agree to the limitations on Musaed Al Jarrah's testimony proposed in your letter.

The Kingdom did not move for any protective order with respect to Jarrah's testimony, and to the contrary, the Kingdom's motion for protective order represented that "Saudi Arabia had already reached out to and obtained the consent of Omar Al Bayoumi, Fahad Al Thumairy, and Musaed Al Jarrah to appear at a deposition." Saudi Arabia has thus waived any claim of privilege as to the scope of Jarrah's testimony. Further, even if that were not the case, the limits proposed in your letter are inconsistent with the Court's rulings as to the limited privileges afforded by the Conventions. We intend to question Jarrah as to all relevant matters.

Steven R. Pounian
Of Counsel



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Please note our new address effective March 26, 2021. Phone and fax numbers remain the same.

Please consider the environment before printing this e-mail.

From: Shen, Andrew C. <ashen@kellogghansen.com>
Sent: Friday, May 21, 2021 10:53 AM
To: Steven R. Pounian <Spounian@kreindler.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>
Cc: Jim Kreindler <JKreindler@kreindler.com>; Andrew J. Maloney <AMaloney@kreindler.com>; Megan Benett <Mbenett@kreindler.com>; 'SCarter1@cozen.com' <SCarter1@cozen.com>; zScott Tarbutton <starbutton@cozen.com>; zRobert Haefele <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; John Fawcett <jfawcett@kreindler.com>; 'Kry, Robert' <rkry@mololamken.com>; 'Nitz, Eric' <enitz@mololamken.com>
Subject: RE: In re 9/11

Counsel –

We have not received a response to the attached letter. Please tell us Plaintiffs' position.

Regards,

Andy

Andrew C. Shen
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From: Shen, Andrew C.
Sent: Friday, May 14, 2021 2:02 PM
To: 'Steven R. Pounian' <Spounian@kreindler.com>; Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>; Huppert, Matthew R. <mhuppert@kellogghansen.com>
Cc: Kreindler, James <jkreindler@kreindler.com>; Maloney, III, Andrew <amaloney@kreindler.com>; 'Megan Benett' <Mbenett@kreindler.com>; 'SCarter1@cozen.com' <SCarter1@cozen.com>; Tarbutton, Joseph <starbutton@cozen.com>; 'zRobert Haefele' <rhaefele@motleyrice.com>; Goldman, Jerry <jgoldman@andersonkill.com>; 'John Fawcett' <jfawcett@kreindler.com>; 'Kry, Robert' <rkry@mololamken.com>; 'Nitz, Eric' <enitz@mololamken.com>
Subject: In re 9/11

Counsel –

Please see the attached letter.

Regards,

Andrew C. Shen
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